## EXHIBIT 3

## **MEMORANDUM IN SUPPORT OF JOINED RULE 12 MOTIONS:**

MOTION FOR MORE DEFINITE STATEMENT; MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND INSUFFICIENT PROCESS, ON THE GROUNDS THAT CLAIMS MUST BE ARBITRATED, AND FAILURE TO STATE A CLAIM; AND MOTION TO STRIKE;

AND IN THE ALTERNATIVE, MOTION TO STAY THE PROCEEDINGS

## Comparison of "Receivership Entities" identified as "Parties" in the Complaint and Entities named in the $TRO^1$ and $PI^2$

|     | "Receivership Entities" in<br>Complaint                                   | "Corporate Defendants"<br>and "Relief Defendants"<br>under TRO<br>("Relief Defendants" in blue) | "Corporate Defendants" and "Relief Defendants" under PI ("Relief Defendants" in blue) |
|-----|---|---|---|
| 1.  | StratFS, LLC (f/k/a Strategic Financial Solutions, LLC)                   | Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC)   | Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC)                               |
| 2.  | Strategic Client Support,<br>LLC (f/k/a Pioneer Client<br>Services, LLC)  | Strategic Client Support,<br>LLC  | Strategic Client Support,<br>LLC  |
| 3.  | Strategic CS, LLC   | Strategic CS, LLC   | Strategic CS, LLC   |
| 4.  | Strategic FS Buffalo, LLC   | Strategic FS Buffalo, LLC   | Strategic FS Buffalo, LLC   |
| 5.  | Strategic NYC, LLC  | Strategic NYC, LLC  | Strategic NYC, LLC  |
| 6.  | BCF Capital, LLC  | BCF Capital, LLC  | BCF Capital LLC   |
| 7.  | T Fin, LLC  | T Fin, LLC  | T Fin, LLC  |
| 8.  | Strategic Consulting, LLC   | Strategic Consulting, LLC   | Strategic Consulting, LLC   |
| 9.  | Versara Lending, LLC  | Versara Lending, LLC  | Versara Lending, LLC  |
| 10. | Strategic Family, Inc.  | Strategic Family, Inc.  | Strategic Family, Inc.  |
| 11. | Anchor Client Services,<br>LLC (now known as CS 1<br>Paas Services, LLC)  | Anchor Client Services,<br>LLC  | Anchor Client Services,<br>LLC  |
| 12. | Bedrock Client Services,<br>LLC   | Bedrock Client Services,<br>LLC   | Bedrock Client Services,<br>LLC   |
| 13. | Boulder Client Services,<br>LLC   | Boulder Client Services,<br>LLC   | Boulder Client Services,<br>LLC   |
| 14. | Canyon Client Services,<br>LLC  | Canyon Client Services,<br>LLC  | Canyon Client Services,<br>LLC  |
| 15. | Carolina Client Services,<br>LLC  | Carolina Client Services,<br>LLC  | Carolina Client Services,<br>LLC  |
| 16. | Great Lakes Client Services,<br>LLC                                       | Great Lakes Client Services,<br>LLC   | Great Lakes Client Services,<br>LLC   |
| 17. | Guidestone Client Services,<br>LLC  | Guidestone Client Services,<br>LLC  | Guidestone Client Services,<br>LLC  |
| 18. | Harbor Client Services,<br>LLC  | Harbor Client Services,<br>LLC  | Harbor Client Services,<br>LLC  |
| 19. | Heartland Client Services,<br>LLC   | Heartland Client Services,<br>LLC   | Heartland Client Services,<br>LLC   |
| 20. | Monarch Client Services,<br>LLC (now known as CS 2<br>Paas Services, LLC) | Monarch Client Services,<br>LLC   | Monarch Client Services,<br>LLC   |
| 21. | Newport Client Services,<br>LLC   | Newport Client Services,<br>LLC   | Newport Client Services,<br>LLC   |

|     | "Receivership Entities" in<br>Complaint                                  | "Corporate Defendants" and "Relief Defendants" under TRO ("Relief Defendants" in blue) | "Corporate Defendants" and "Relief Defendants" under PI ("Relief Defendants" in blue) |
|-----|--|--|---|
| 22. | Northstar Client Services,<br>LLC  | Northstar Client Services,<br>LLC  | Northstar Client Services,<br>LLC   |
| 23. | Option 1 Client Services,<br>LLC   | Option 1 Client Services,<br>LLC   | Option 1 Client Services,<br>LLC  |
| 24. | Pioneer Client Servicing,<br>LLC   | Pioneer Client Servicing,<br>LLC   | Pioneer Client Servicing,<br>LLC  |
| 25. | Rockwell Client Services,<br>LLC   | Rockwell Client Services,<br>LLC   | Rockwell Client Services,<br>LLC  |
| 26. | Royal Client Services, LLC   | Royal Client Services, LLC   | Royal Client Services, LLC  |
| 27. | Stonepoint Client Services,<br>LLC                                       | Stonepoint Client Services, LLC  | Stonepoint Client Services,<br>LLC  |
| 28. | Summit Client Services,<br>LLC (now known as CS 3<br>Paas Services, LLC) | Summit Client Services,<br>LLC   | Summit Client Services,<br>LLC  |
| 29. | Whitestone Client Services, LLC  | Whitestone Client Services, LLC  | Whitestone Client Services, LLC   |
| 30. | Twist Financial, LLC   | Twist Financial, LLC   | Twist Financial, LLC  |
| 31. | Duke Enterprises, LLC  | Duke Enterprises, LLC  | Duke Enterprises, LLC   |
| 32. | Blaise Investments, LLC  | Blaise Investments, LLC  | Blaise Investments, LLC   |
| 33. | Lit Def Strategies, LLC  | Lit Def Strategies, LLC  | Lit Def Strategies, LLC   |
| 34. | Relialit, LLC  | Relialit, LLC  | Relialit, LLC   |
| 35. | Atlas Debt Relief, LLC   |  | Atlas Debt Relief, LLC  |
| 36. | Timberline Financial, LLC  |  | Timberline Financial, LLC   |
| 37. | Acorn 21 Services, LLC   |  |   |
| 38. | Atlas Client Services, LLC   |  |   |
| 39. | Chinn Client Services, LLC   |  |   |
| 40. | Cs0621Jade, LLC  |  |   |
| 41. | Cs0821Creek, LLC   |  |   |
| 42. | Cseternal1121, LLC   |  |   |
| 43. | Csstorm1121, LLC   |  |   |
| 44. | Gardner Client Services,<br>LLC  |  |   |
| 45. | Hallock Client Services,<br>LLC  |  |   |
| 46. | Spring Client Services, LLC  |  |   |
| 47. | Fidelis Legal Support<br>Services, LLC                                   |  |   |
| 48. | Hedgewick Consulting,<br>LLC   |  |   |
| 49. | The Blust Family 2019 Irrevocable Trust Through Paul Hull, Jr., Trustee  |  |   |

|     | "Receivership Entities" in<br>Complaint | "Corporate Defendants" and "Relief Defendants" under TRO ("Relief Defendants" in blue) | "Corporate Defendants" and "Relief Defendants" under PI ("Relief Defendants" in blue) |
|-----|---|--|---|
| 50. | The Bush Lake Trust                     |  |   |
|     | Through Timothy Miller,                 |  |   |
|     | Trustee                                 |  |   |
| 51. | Cell Gramercy 2 of Contego              |  |   |
|     | Insurance, Inc.                         |  |   |
| 52. | Strategic LD, LLC                       |  |   |
| 53. | Versara DST 2019-2                      |  |   |
| 54. | Fusion Services, LLC                    |  |   |
| 55. | Axel Development Sag                    |  |   |
|     | Harbor LLC                              |  |   |
| 56. | MyG Investments, LLC                    |  |   |
| 57. | T.C.I.G., LLC                           |  |   |
| 58. | Timberline Capital LLC.                 |  |   |
|     |   | Blust Family Irrevocable   | Blust Family Irrevocable  |
|     |   | Trust through Donald J.  | Trust through Donald J.   |
|     |   | Holmgren, Trustee  | Holmgren, Trustee   |

<sup>1</sup> Ex Parte Temporary Restraining Order with an Asset Freeze, Appointment of a Receiver, and Other Equitable Relief, dated January 11, 2024 (CFPB case, Dkt. 12).

<sup>&</sup>lt;sup>2</sup> Preliminary Injunction, dated March 4, 2024 (CFPB case, Dkt. 184).